

L128-0793570.DOC

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS
Civil Action Number: 2005 CV 10488 JLA

TIMOTHY HILLS,

Plaintiff

vs.

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TOWN OF STOUGHTON,

DAVID M. COHEN, Individually and

MANUEL CACHOPA, Individually

Defendants

DEFENDANT, DAVID M. COHEN'S. MOTION FOR PROTECTIVE ORDER

The defendant David Cohen moves this court to issue a protective order prohibiting discovery, admissions or depositions that requires the defendant, David Cohen, to personally respond.

As grounds for this motion, the defendant states that he is the subject of an ongoing criminal prosecution and such an order is necessary to protect his 5th Amendment rights.

In further support of this motion, the defendant attaches a memorandum hereto.

/s/ John F. Gleavy

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